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APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

March 12, 2025

**BY ECF**

Hon. John G. Koeltl  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl St. New York, NY 10007-1312  
Courtroom 14A

Re: ***Stella Diam, Inc. v. JPMorgan Chase Bank, N.A., Case No. 1:25-cv-01785 —Request for Order Setting Deadlines***

Dear Judge Koeltl:

Pursuant to Your Honor's Individual Practices, we write on behalf of defendant JPMorgan Chase Bank, N.A. ("Chase"), who we represent in this matter, to request that this Court enter an order in connection with deadlines for (a) Plaintiff to file an initial Complaint in this action and (b) Chase to respond to said Complaint once it is filed.

By way of background, this action was commenced on January 29, 2025, when Plaintiff filed a Summons with Notice in the Supreme Court of New York, New York County pursuant to CPLR 305(b). Chase removed the action to this Court on March 3, 2025 by filing a Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 (Dkt. No. 1), without waiting for service of a Complaint. Unlike the New York CPLR, the Federal Rules of Civil Procedure do not contain any provisions or procedures for the filing of a Complaint after an action is commenced by the filing of a Summons with Notice. Thus, Chase has conferred with counsel for Plaintiff Stella Diam. Inc., and the parties have agreed to the following schedule, which they respectfully request that the Court adopt:

- Plaintiff will file a Complaint in the above-captioned case on or before April 28, 2025; and
- Chase will respond to the Complaint as may be appropriate on or before June 12, 2025.

Nothing contained herein shall be construed as a waiver or release of any of the parties' rights, claims, or defenses. We thank the Court for its attention to this matter and are available to discuss at Your Honor's convenience.

Respectfully submitted,

/s/ Leah N. Jacob

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